

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

TIANNA PERRY et al.

Plaintiffs,

v.

CELTAIN BATTERSON et al.

Defendants.

Civil Action File No. 1:24-cv-00269-
CEA-CHS

Joint Motion to Stay Case

Come now the Parties, by and through counsel, and hereby request that the Court enter a stay in the instant matter to allow the Parties to pursue mediation. The Parties believe that the case is in a posture where mediation is a potentially worthwhile endeavor.

First, the Parties have engaged in enough discovery to reach a place where all Parties have gained material insight into their relative positions. The Parties have collectively taken twelve fact depositions, have exchanged thousands of pages of written discovery, and have collectively identified ten expert witnesses, most of whom have prepared extensive reports that further illuminate the Parties' relative positions.

Second, as the Court is aware, the Parties only recently identified the ten expert witnesses, with the last expert's report disclosed on August 5, 2025. (See Doc. 52.) Since they were very recently identified, the Parties have only deposed one of the ten identified expert witnesses. The Parties believe that it would be a worthwhile endeavor

to pursue mediation now, before the Parties incur the considerable expense of conducting these expert depositions. The Parties intend to use a private mediator.

To that end, the Parties request that the Court enter an ORDER staying the case, which requires the Parties to complete mediation within the next forty-five (45) days, and, if the Parties do not resolve the case at mediation, which lifts the stay and provides for sixty (60) days to complete discovery, which would allow the Parties time to depose the recently-identified expert witnesses. The Parties request that the other deadlines in the Scheduling Order follow, including an extension of the dispositive motion deadline, but the Parties do not ask the Court to move the trial date. A draft Order is provided herewith.

This 14th day of August, 2025

/s/ Mark Begnaud

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to counsel of record

This 14th Day of August, 2025.

/s/ Mark Begnaud

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